

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE “A” HERETO,

Defendants.

Case No.: 1:24-cv-01547-ARW

Honorable Andrea R. Wood

Hearing: January 21, 2025

Time: 11:00 a.m.

**MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST THE IDENTIFIED
DEFAULTED SCHEDULE “A” DEFENDANTS PURSUANT TO FRCP 55(b)(2)**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) hereby moves for entry of Default Judgment (the “Motion”) pursuant to Federal Rule of Civil Procedure 55(b)(2) (“Rule 55(b)(2)”) against the one hundred forty-five (145) identified Schedule “A” Defendants (the “Defaulted Defendants”), which have been separately listed in Exhibit “1” to the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”). Plaintiff’s Motion is made and based upon the supporting Memorandum of Law, the Mangano Declaration, the Declaration of Liangjie Li (the “Li Decl.”), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain.

DATED: December 31, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of December 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, eBay.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

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163	xxdxx2 shop Seller ID 2158934040 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	dddxxws222@163.com
164	yandee Seller ID 2504580565 Jinxu Lu No.50,Yuxin South St.,Hanshan NO.1616 Jinzhou Business Bldg, handan Hebei CN 56000	xiaoguoba778@outlook.com

No.	Seller	Seller's Contact Information
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166	yiqp33 Seller ID 2340681718 Pengyi Bi qiaokouqubaofergerlu74haoA244 Wuhan CN 43000	yiqpeng34@outlook.com
167	yngdgg Seller ID 2497428252 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	yangdong753@outlook.com
168	zhaokp18 Seller ID 2302108160 Yi De Zhao zhen ping xian xue feng jie dao ban shi chu xu qiao bei ce CN474250	abcoutdoor@163.com
169	zhongbiaoltd shop Seller ID 1367842756 Dalu Xin beiyuanstreet chunhua rod 588 C1 501Jinhua Yiwu CN 322000	zhongbiaoltd01@sina.com
170	zhongbiaomaoyi.ltd shop Seller ID 2150079338 Dalu Xin beiyuanstreet chunhua rod 588 C1 501Jinhua Yiwu CN 322000	zhongbiaomaoyi@163.com
174	mifitu Seller ID 2533533368 Jiqing Zhang No 1617,16th Fl, Jinzhou Busi Bldg, No 50 Yuxin South St, Hanshan District Handan, Hebei, CN 56001	mifituu@outlook.com
175	newlife1848 Seller ID 2008485996 Qlao Wang henanshengnanyangshizhenpingxinxuefengyushenlu nanduanuyjinghuachengyiqidongmenmian107 Nanyang CN 474250	xiaomao99@126.com
176	qazxc6 Seller ID 2534695044 Caihong Yao Henanshengpingdingshanshilushanxianranghexiangchen loucunbazu pingdingshan CN 467300	caihongmaoyi_vip@163.com
177	rebern Seller ID 2507267004 Yang Li Jiangxiaqujingjikaifaqu canglongdaokeyiyuan wuhanqiaoyakangruiyileyuan7dong6ceng14shi Wuhan CN 430000	reberntp@outlook.com

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**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE “A” HERETO,

Defendants.

Case No.: 1:24-cv-01547-ARW

Honorable Andrea R. Wood

Hearing: January 21, 2025

Time: 11:00 a.m.

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY OF
DEFAULT JUDGMENT AGAINST THE IDENTIFIED DEFAULTED SCHEDULE “A”
DEFENDANTS PURSUANT TO FRCP 55(b)(2)**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) hereby submits this Memorandum of Law in support of its Motion for Entry of Default Judgment (the “Motion”) pursuant to Federal Rule of Civil Procedure 55(b)(2) (“Rule 55(b)(2)”) against the identified one-hundred forty-five (145) Schedule “A” Defendants (the “Defaulted Defendants”), which have been separately listed in Exhibit “1” to the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”). Plaintiff’s Motion is made and based upon this Memorandum of Law, the Mangano Declaration, the Declaration of Liangjie Li (the “Li Decl.”), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain.

I. INTRODUCTION

On December 18, 2024, the Court granted Plaintiff’s Motion for Entry of Clerk’s Default against the Defaulted Defendants. [Dkt. No. 59.] Pursuant to Rule 55(b)(2), Plaintiff now

respectfully moves this Court for entry of a default judgment finding the Defaulted Defendants liable on all counts asserted in Plaintiff's Complaint. [Dkt. No. 23.] These asserted counts include claims for Copyright Infringement (Count I), False Designation of Origin under 35 U.S.C. §1125(a) (Count II), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count III). [Dkt. No. 23 at 8-13.]

In connection with its asserted claims for relief, Plaintiff seeks an award of statutory damages pursuant to 17 U.S.C. § 504(c) against all Defaulted Defendants, which should be enhanced, for their willful infringement of the following four (4) federally registered copyrights asserted in this action: (1) VA0002379894; (2) VA0002379911; (3) VA0002380492; and (4) VA0002379893 (the "Copyright Protected Images"). (Mangano Decl. ¶ 5.) Plaintiff additionally requests the Court issue a permanent injunction against the Defaulted Defendants. *See* 17 U.S.C. § 502(a). Furthermore, Plaintiff requests an award attorneys' fees and costs for the Defaulted Defendants' willful infringement of the company's Copyright Protected Images pursuant to 17 U.S.C. § 505. Alternatively, Plaintiff requests issuance of a permanent injunction and an award of attorneys' fees and costs based on the Defaulted Defendants' willful violation of the Uniform Deceptive Trade Practices Act.

As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the eBay.com online sales platform (the "Platform") to market and sell knockoff, counterfeit products resembling Plaintiff's authentic Rotita brand products, thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Mangano Decl. ¶ 6.) Moreover, the Defaulted Defendants are alleged to be operating as part of a coordinated, sophisticated counterfeit product network that utilizes a common supply chain and manufacturing source to fulfill consumer orders for knockoff Rotita

brand products by displaying, without authorization, Plaintiff's Copyright Protected Images on their online storefronts. (Mangano Decl. ¶¶ 8, 11-12.) These circumstances clearly demonstrate the Defaulted Defendants have willfully and intentionally infringed Plaintiff's Copyright Protected images, thereby supporting the company's request for enhanced statutory damages and its entitlement to an award of attorneys' fees and costs under either the Copyright Act (17 U.S.C. § 505) or the Uniform Deceptive Trade Practices Act (815 ILCS § 510/3). (*Id.*)

Procedurally, Rule 55(b)(2) provides for a court-ordered default judgment which establishes, as a matter of law, that defendants are liable to plaintiff on each cause of action alleged in the complaint. *United States v. Di Mucci*, 879 F.2d 1488, 1497 (7th Cir. 1989). When the Court determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged, and the defendants are liable as a matter of law as to each cause of action alleged in the complaint. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994). Plaintiff meets the requirements for entry of the requested default judgment under Rule 55(b)(2).

II. ARGUMENT

On December 18, 2024, the Court granted Plaintiff's Motion for Entry of Clerk's Default. [Dkt. No. 59.] Thus, the Defaulted Defendants' right to appear in this action and contest Plaintiff's asserted claims for relief have been precluded. *See Black*, 22 F.3d at 1399. Given this procedural posture, the present Motion seeks to establish the Defaulted Defendants' liability for Plaintiff's asserted claims for relief against them. *See Fed.R.Civ.P. 55(b)(2)*.

Specifically, Plaintiff's Motion seeks entry of a default judgment against the Defaulted Defendants determining them liable for Copyright Infringement (Count I), False Designation of Origin under 35 U.S.C. § 1125(a) (Count II), and violation of the Uniform Deceptive Trade Practices Act (Count III) as asserted in the company's Complaint. [Dkt. No. 23 at 8-13.]. As

discussed below, Plaintiff is entitled to entry of a default judgment against the Defaulted Defendants pursuant to Rule 55(b)(2) that awards the company enhanced statutory damages for willful copyright infringement, issuance of a permanent injunction for copyright infringement and/or violation of the Uniform Deceptive Trade Practices Act, and an award of attorneys' fees and costs for willful copyright infringement and/or their willful violation of the Uniform Deceptive Trade Practices Act.

A. Plaintiff is Entitled to Entry of the Requested Default Judgment.

Rule 55(b)(2) of the Federal Rules of Civil Procedure generally provides for entry of a court-ordered default judgment against one or more defending parties that failure to appear, answer, and/or defendant allegations asserted against them. Fed.R.Civ.P. 55(b)(2). A default judgment establishes, as a matter of law, that named, unresponsive, defendants are liable on each cause of action alleged against them in the complaint. *Di Mucci*, 879 F.2d at 1497. When a court determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged, and the defendants are liable as a matter of law as to each cause of action alleged in the complaint upon entry of default judgment. *Black*, 22 F.3d at 1399.

As noted above, on December 18, 2024, the Court granted Plaintiff's Motion for Entry of Clerk's Default against the Defaulted Defendants. [Dkt. No. 59.] Thus, default has already been entered against the Defaulted Defendants. Given the Court's entry of Default, Plaintiff is entitled to entry of a default judgment pursuant to Rule 55(b)(2) against the Defaulted Defendants for copyright infringement, false designation of origin, and violation of the Uniform Deceptive Trade Practice Act as asserted in the Complaint. [Dkt. No. 23 at 8-13.]

As argued below, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulted Defendants: (1) an award of statutory damages and profits

for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced statutory damages for willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) entry of a permanent injunction pursuant to 17 U.S.C. § 502(a); (4) alternatively, entry of a permanent injunction pursuant to 815 ILCS § 510/3; and (5) an award of attorneys' fees and costs pursuant to 17 U.S.C. § 505 for willful copyright infringement and/or for willful violation of the Uniform Deceptive Trade Practices Act pursuant to 815 ILCS § 510/3. Plaintiff does not seek any relief related to its false designation of origin claim that such relief would be duplicative of the relief requested for willful copyright infringement and for violation of the Uniform Deceptive Trade Practices Act.

B. Plaintiff is Entitled to the Relief Requested.

Through entry of default [Dkt. No. 59], Plaintiff has established that all Defaulted Defendants: (1) are liable for intentionally and willfully infringing the Copyright Protected Images; (2) are liable for false designation of origin; and (3) have willfully violated the Uniform Deceptive Trade Practices Act. [Dkt. No. 23 at 8-13.] As such, the only the following issues remain to be adjudicated through the Motion: (1) Plaintiff's entitlement to an award of statutory damages for infringement of the Copyright Protected Images; (2) the company's request that any statutory damage award be enhanced based on the Defaulted Defendants' willful copyright infringement; (3) the company's right to issuance of a permanent injunction against the Defaulted Defendants; and (4) the propriety of an award of attorneys' fees and costs for the Defaulted Defendants' willful infringement of the Copyright Protected Images and/or their willful violation of the Uniform Deceptive Trade Practices Act. Plaintiff asserts that it is entitled to all relief requested through its Motion.

1. Plaintiff is entitled to statutory damages under 17 U.S.C. § 504(c)(1).

Turning first to the request for an award of statutory damages under 17 U.S.C. § 504(c)(1)

against the Defaulted Defendants. Plaintiff is entitled to such relief for the Defaulted Defendants' infringement of the company's Copyright Protected Images, which it maintains was done willfully and intentionally. (Mangano Decl. ¶¶ 8, 11-12.)

A copyright owner is entitled to recover the actual damages suffered for infringement, and any profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages. 17 U.S.C. § 504(b). In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work. 17 U.S.C. § 504(b). "[S]tatutory damages have been held to be appropriate on a motion for default judgment because the defaulting party has the information needed to prove actual damages." *White v. Marshall*, 771 F.Supp.2d 952, 956 (E.D. Wis. 2011); *see also Wondie v. Mekuria*, 742 F.Supp.2d 118, 124-25 (D.D.C. 2010); *Lifted Research Grp., Inc. v. Behdad, Inc.*, 591 F.Supp.2d 3, 8 (D.D.C. 2008).

First, Plaintiff has asserted a viable claim for infringement of the Copyright Protected Images. To prove copyright infringement, a plaintiff must show: "(1) ownership of a valid copyright; and (2) copying of constituent elements of the work that are original." *JWC Invs., Inc. v. Novelty, Inc.*, 482 F.3d 910, 914 (7th Cir. 2007). A certificate of copyright registration provides a *prima facie* presumption of validity. *Mid. American Title Co. v. Kirk*, 59 F.3d 719, 721 (7th Cir. 1995). Here, Plaintiff has alleged its ownership of the asserted. Copyright Protected Images in its Complaint [Dkt. No. 23 at 9] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 23, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulted Defendants have infringed the company's Copyright Protected Images. [Dkt. No. 23 at 15-34.] Accordingly, Plaintiff has

established that the Defaulted Defendants have infringed the company's Copyright Protected Images.

Next, Plaintiff is entitled to an award of statutory damages given the circumstances in this action. An award of statutory damages is appropriate because actual damages "are often virtually impossible to prove" *White*, 771 F.Supp.2d at 956. In awarding statutory damages, the court is not required to follow any rigid formula. *Id.* (citing *Chi-Boy Music v. Charlie Club, Inc.*, 930 F.2d 1224, 1229 (7th Cir. 1991)). Instead, the court enjoys wide discretion in setting a statutory damage award within the prescribed range from \$750 to \$30,000 per infringement. *Broadcast Music, Inc. v. Star Amusements, Inc.*, 44 F.3d 485, 489 (7th Cir. 1995). The court may consider such factors as the difficulty or impossibility of proving actual damages, the circumstances of the infringement, and the efficacy of the damages as a deterrent to future copyright infringement. *Chi-Boy Music*, 930 F.2d at 1229.

Plaintiff has established unquestionably viable copyright infringement claims in this case. Most notably, Plaintiff secured entry of a preliminary injunction in this case. [Dkt. No. 42.] This ruling is consistent with Judge Kennelly's issuance of preliminary injunctive relief in Plaintiff's favor against defendants engaged in identical acts of intentional copyright infringement on the same Platform in what he considered to be one of the most contested Schedule "A" cases he had encountered in recent memory. (Mangano Decl. ¶ 9.) Following Judge Kennelly's decision, defendants in other pending actions brought by Plaintiff, including the Defaulted Defendants in this action, have simply failed to appear and defend. (*Id.*) The Defaulted Defendants' refusal to appear and defend against the asserted claims, however, has deprived Plaintiff of the ability to present evidence concerning verifiable infringing sales or costs associated with such sales. (*Id.* ¶ 7.)

Specifically, Plaintiff has neither obtained, nor are the Defaulted Defendants participating in these proceedings, so that the Court can be provided with the infringers' deductible expenses related to the sale of the counterfeit products associated with the unauthorized use and display of the company's Copyright Protected Images. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulted Defendants' gross infringing sales of their knockoff products or the associated deductible expenses from same. (Mangano Decl. ¶ 7.) Moreover, while Plaintiff can estimate the range of the Defaulted Defendants' net profits from their infringing sales, this estimate is highly speculative and cannot affirmatively account for the advertising expenses saved through the unauthorized use and display of the company's Copyright Protected Images for which it has created at considerable expense. (Li Decl. ¶ 11.) Accordingly, an award of statutory damages is appropriate because actual damages are "virtually impossible to prove . . ." in this case. *See White*, 771 F.Supp.2d at 956.

Given the foregoing circumstances, and the nature of the Defaulted Defendants' conduct, Plaintiff asserts that it is entitled to an award of statutory damages in the amount of \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image in this action. (Mangano Decl. ¶ 12, Ex. 1.) First, the Defaulted Defendants were provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend, which resulted in the Court ordering Entry of Clerk's Default against them. [Dkt. No. 59.] As a result of the Defaulted Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (Mangano Decl. ¶ 7.) Moreover, Plaintiff has expended considerable capital in securing registration of the Copyright Protected Images and advertising its brand in the United States and in the State of Illinois. (Li Decl. ¶ 10.) This includes spending over \$80,000 to secure the company's copyright registrations

with the United States Copyright Office and spending approximately \$8,000,000 to \$12,000,000 annually to advertise and promote its Rotita brand in the United States. (Li Decl. ¶ 10.) These facts unquestionably support Plaintiff's request for an award of \$5,000.00 in statutory damages per infringed Copyright Protected Image per Defaulted Defendant.

Next, the circumstances of the Defaulted Defendants' infringement clearly support awarding the requested statutory damage award against them. It is without question that the Defaulted Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have almost instantaneously appeared on the Defaulted Defendants' online stores maintained with the Platform. (Li Decl. ¶ 7.) Moreover, the Defaulted Defendants have unquestionably been operating their online stores using the misappropriated Copyright Protected Images through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis. (Mangano Decl. ¶¶ 8, 11.) Accordingly, the Defaulted Defendants unquestionably intentionally, and willfully, infringed Plaintiff's Copyright Protected Images in order to sell their knockoff products, thereby justifying an award of statutory damages.

Based on the foregoing, Plaintiff respectfully requests the Court award \$5,000.00 in statutory damages against each of the Defaulted Defendants for each infringement of the Copyright Protected Images. As set forth in Plaintiff's supporting documentation, the Defaulted Defendants in this action should be found liable for \$5,000.00 because of their infringements of the Copyright Protected Images. (Mangano Decl. ¶ 12, Ex. 1.) Accordingly, Plaintiff respectfully requests the Court an award of statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) in an

amount not less than \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image. (Mangano Decl. ¶ 12, Ex. 1)

2. Plaintiff is entitled to enhanced statutory damages.

Next, the circumstances of the Defaulted Defendants' infringement clearly support awarding an enhanced statutory damage award of, at least, treble damages against them. Simply put, the Defaulted Defendants' infringing conduct in this action is unquestionably willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2).

It is without question that the Defaulted Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. (Mangano Decl. ¶¶ 8, 11-12.) In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have almost instantaneously appeared on the Defaulted Defendants' online stores maintained with the Platform. (Li Decl. ¶ 7.) Moreover, the Defaulted Defendants have clearly been operating their online stores using the misappropriated Copyright Protected Images through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis. (Mangano Decl. ¶¶ 8, 11-12.)

In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulted Defendants, have been acting through their counterfeit network to actively monitor and post information on the Plaintiff's pending cases on the website www.SellerDefense.cn. (Mangano Decl. ¶ 8.) This has apparently been done to advise defendants in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. (*Id.*) These circumstances reveal an overall strategy by all non-appearing defendants, including the Defaulted Defendants, to simply cut their losses where

Plaintiff has a high likelihood of success, abandon any online platform restrained funds, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. (Mangano Decl. ¶ 8.) Such circumstances support awarding Plaintiff enhanced statutory damages in this action. *See Chi-Boy Music*, 930 F.2d at 1229.

The facts presented further support awarding the enhanced statutory damages against the Defaulted Defendants on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30. Simply put, the Defaulted Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Mangano Decl. ¶ 8.) At first, all named defendants in Plaintiff's copyright enforcement actions would vigorously fight the allegations against them until Judge Kennelly issued a preliminary injunction in Plaintiff's favor after a highly contested in-person hearing, which has resulted the Defaulted Defendants, and defendants in other pending actions commenced by Plaintiff, electing not to appear and defend. (*Id.* ¶ 9.) Simply put, the Defaulted Defendants, as with other similarly situated defendants, have simply taken the apparent position that any recovery issued by a court is only executable against their restrained asserts on the named online platform. (*Id.*) This conduct demonstrates an intentional wiliness to ignore the Court's authority to impose significant statutory damages in this action to send a message to the Defaulted Defendants, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defaulted Defendants, or other similar infringers monitoring this case, will post this anticipated reward on the www.SellersDefense.cn website as notice of the consequences for their intentional, and orchestrated actions.

Based on the foregoing, Plaintiff respectfully requests the Court award enhanced statutory damages of not less than treble the requested statutory damages of \$5,000.00 per Defaulted

Defendant per infringed Copyright Protected Work, which represents an award of \$15,000.00 for each Defaulted Defendant per infringed work. As set forth in Plaintiff's supporting documentation, the Defaulted Defendants in this action should be found liable for \$15,000 each because of their willful infringement for each of the four (4) Copyright Protected Images. (Mangano Decl. ¶ 12, Ex. 1) Accordingly, Plaintiff respectfully requests the Court enter an award of \$5,000.00 in statutory damages per Defaulted Defendant per infringed Copyright Protected Image, which should be enhanced for willful infringement to \$15,000.00 per Defaulted Defendant per infringed Copyright Protected Work, pursuant to 17 U.S.C. § 504(c)(2).

3. Plaintiff is entitled to a permanent injunction.

Next, Plaintiff is entitled to entry of a permanent injunction against the Defaulted Defendants. This request is justified under either 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3.

First, the Court has already determined that Plaintiff is entitled to preliminary injunctive relief in this action, which includes issuance against the Defaulted Defendants. [Dkt. No. 42.] Nothing has occurred since entry of the preliminary injunction that would alter or prohibit entry of a permanent injunction against the non-appearing Defaulted Defendants. In short, the compelling fact presented to the Court that justified entry of preliminary injunctive relief stand unchallenged by the Defaulted Defendants and, subsequently, their right to appear and contest this decision has been cut-off by entry of default. [Dkt. No. 59.] As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3, is uncontested and supported by the substantial evidentiary record previously provided to the Court when preliminary injunctive relief was issued.

Accordingly, Plaintiff is entitled to issuance of permanent injunctive relief against the Defaulted Defendants.

4. Plaintiff is entitled to an award of attorneys' fees and costs.

Plaintiff is also entitled to an award of attorneys' fees and costs against the Defaulted Defendants. Such relief should be granted pending Plaintiff moving the Court for a specific award pursuant to its submission of a "Fee Award" pursuant to LR 54.3.

Plaintiff's request for an award of attorneys' fees and costs is two-fold. First, such an award is warranted based on issuance of enhanced statutory damages based on the Defaulted Defendants' willful infringement of the company's Copyright Protected Images. *See* 17 U.S.C. § 505. Second, and alternatively, Plaintiff is entitled to an award of attorneys' fees and costs based on the Defaulted Defendants' willful violation of the Uniform Deceptive Trade Practices Act. *See* 815 ILCS § 510/3. Under either statutory provision, the facts presented clearly justify the willful infringement and violation of Plaintiff's federally secured rights in and to the Copyright Protected Images, which have been done to deceive the consuming public. (Mangano Decl. ¶¶ 8, 11-12.) Accordingly, Plaintiff is entitled to an award of attorneys' fees and costs, subject to the company filing a "Fee Award" pursuant to LR 54.3

III. CONCLUSION

Based on the foregoing, Plaintiff respectfully request entry of default judgment against the Defaulted Defendants pursuant to Rule 55(b)(2). In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages in the amount of \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages of \$15,000.00 per Defaulted Defendant per infringed Copyright Protected Image based on their willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent

injunction against the Defaulted Defendants pursuant to 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3; (4) an award of attorneys' fees and costs pursuant 17 U.S.C. § 505 and/or 815 ILCS § 510/3 based on the Defaulted Defendants' willful conduct in an amount to be determined upon submission of a "Fee Award" under LR 54.3; and (5) such other relief as the Court deems just and proper.

DATED: December 31, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of December 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, eBay.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

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5	babyzeal Seller ID 2116125700 Zhuoxiao Cen RM 1205 12 F TOWER 1 SILVERCORD 30 CANTON ROAD TST KL Hongkong 999077	teal20bz@hotmail.com

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9	Clothes Dreamland aka Godvehicle Seller ID 2042454203 Xinjie Deng FLAT RM 826 8 F OCEAN CENTRE HARBOUR CITY 5 CANTON ROAD TST KL Hong Kong 999077	gvwhite19@hotmail.com
11	day9330 Seller ID 2533525293 Yali Xing 1610,16th Fl,Jinzhou Busi Bldg, No50 Yuxin South St,Hanshan District, Handan CN 56001	dayfami@outlook.com
13	dingxi5 Seller ID 2499431708 Yang Li Jiangxiaqujingjikaifaqu canglongdaokeyiyuan wuhanqiaoyakangruiyileyuan7dong6ceng14shi Wuhan CN 430000	dingxiangjie9999@outlook.com
14	drea6677 Seller ID 2497672408 Dandan Cheng No 1603,16th Fl,Jinzhou Busi Bldg,No 50 Yuxin South St, Hanshan District, Handan,Hebei CN 56001	drea123m@outlook.com
15	dreamyhouse888 Seller ID 1972980942 shao na zhou fengzequ chengdongjiedaoxifushequ xifulu 8hao xuefushangcheng 1zhuang 2702shi fujiangsheng quanzhoushi CN 362000	18965503262@163.com
17	eagover22rk Seller ID 2487747605 Jian Liao UNIT 1011 12 10 F CHEVALIER COMMERCIAL CENTRE 8 WANG HOI ROAD KOWLOON BAY KL Hongkong 999077	oceanfeo@hotmail.com
18	eingtill27rk Seller ID 2489292915 Jian Liao UNIT 1011 12 10 F CHEVALIER COMMERCIAL CENTRE 8 WANG HOI ROAD KOWLOON BAY KL Hongkong 999077	timefet@hotmail.com
21	fivestarshopping Seller ID 2336352227 Fangyu Li ngtoushequBantianjiedao Tiananyunguerqi1 Shenzhen CN 518129	phoebehurt@163.com

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28	Generalfox Official Seller ID 2036271691 Yaqin Huang FLAT RM 1318 19 13 F HOLLYWOOD PLAZA 610 NATHAN ROAD MONG KOK KL Hong Kong 999077	gfbeige19@hotmail.com
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34	in.marry Seller ID 1019214757 Xueli chen ju mao jie 185 hao huo li shang wu guang chang C dong 4 lou 426 shi su zhou shi CN 215000	wlsz2013@outlook.com
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47	lintao Seller ID 2390536828 Tao Lin jingzhoushijinyuanshijicheng5qu5dong2704 jingzhoushi CN 434000	lt1771908630@163.com
48	lly_7419 Seller ID 2344254559 Yang Li canglongdaokeyiyuan wuhanqiaoyakangrui yileyuan7dong6ceng14shi Wuhanshijiangxiaqujingjikaifaqu CN 430000	llynga87@outlook.com
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79	thel5045 Seller ID 2339662285 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	thelastnb@outlook.com
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86	yes244 Seller ID 2507302566 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	lsy1981109991@outlook.com
87	yie-25 Seller ID 2326616337 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	yiermm@outlook.com
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96	bownes111 Seller ID 2410529489 xiu zhang xu lan chun tian 7 1 604 qing shan hu qu cheng nan da dao 2799 nanchang CN 330000	bownes000@163.com
97	changlan5 Seller ID 2306197327 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	luxiaochang977@outlook.com
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100	DD.DIY.BEADS Seller ID 2204065434 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	glass1331@163.com
101	dzdl_31 Seller ID 2339658057 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	dzdlzysdk@outlook.com
102	EDC world store/zhaoyi9572 Seller ID 2193033932 Yi De Zhao zhen ping xian xue feng jie dao ban shi chu xu qiao bei ce CN474250	zhaoyide2020@126.com
103	fefeas2 shop Seller ID 2160528602 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi	waxxxxawwxx@163.com

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108	hanhe654 Seller ID 2384917434 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	hanshewei456@outlook.com
109	hanyanye shop Seller ID 2160811647 Haifeng Wang wolongquwuhoujiedaozhongzhouxilu639hao jinghuayuanxiaoqu8haolou2danyuan101shi henanshengnanyangshi CN 473000	1106789666@qq.com
110	hello20200928 shop Seller ID 2205244389 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	aderc886@163.com
111	if-you-need-DIY Seller ID 2152432518 Dalu Xin beiyuanstreet chunhua rod 588 C1 501 Jinhua Yiwu CN 322000	fafases@163.com
112	if-you-need-watch/sousoux Seller ID 2152443044 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	wsxwsxasa@163.com
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118	jngunlai Seller ID 2564524380 yanli guo Bldg.2,Guangyayuan Industrial Zone,Guangyayuan Rd,Longgang Shenzhen CN 518000	afagkgy@outlook.com
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132	mwangky9 Seller ID 2266870408 Fachang Zhi fanjiajinglujiadunxincun 5 No9 floor4 zhushanqujingchengzhen jing de zhen CN 333000	dongjue7363@163.com
133	ninieed Seller ID 2549081987 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	cniniee@outlook.com
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145	swtinf-47 Seller ID 2348939495 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	swtinfengzhao@outlook.com
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150	welcome_to_order shop Seller ID 1226202251 Dalu Xin beiyuanstreet chunhua rod 588 C1 501 Jinhua Yiwu CN 322000	lixiaohui8868@sina.com
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167	yngdgg Seller ID 2497428252 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	yangdong753@outlook.com
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175	newlife1848 Seller ID 2008485996 Qlao Wang henanshengnanyangshizhenpingxinxuefengyushenlu nanduananyujinghuachengyiqidongmenmian107 Nanyang CN 474250	xiaomao99@126.com
176	qazxc6 Seller ID 2534695044 Caihong Yao Henanshengpingdingshanshilushanxianranghexiangchen loucunbazu pingdingshan CN 467300	caihongmaoyi_vip@163.com
177	rebern Seller ID 2507267004 Yang Li	rebernyp@outlook.com

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	Jiangxiaqujingjikaifaqu canglongdaokeyiyuan wuhanqiaoyakangruiyileyuan7dong6ceng14shi Wuhan CN 430000	
178	shwa520109 Seller ID 2328972903 Xiangbin Zhang qiaokouqu gutianerlu changtianlu5hao yiceng14shi Wuhan CN 430030	shwagole1@outlook.com
180	wuying130 Seller ID 2080690123 Dandan Cheng No 1603,16th Fl, Jinzhou Busi Bldg, No 50 Yuxin South St, Hanshan District, Handan, Hebei CN 56001	wuyingying130@outlook.com
181	yananlssqian Seller ID 2277659053 Zhenyu he ZhongHaiXiAnxiaoqu 4 2 301 XIHu Qu LeiChi Road 666 Nan Chang CN 330000	ykj414351@21cn.com
183	ainnee35 Seller ID 2277690756 Shanshan Yan Jinzhou Busi Bldg17thFl No1702 No50 Yuxin St Hanshan District Handan Hebei CN 56001	ainnee357@outlook.com
184	crytall Seller ID 2398942506 CHAO PAN Room 401 389 Jihua Road Buji street Longgang District SHENZHEN CN 518000	crystaljool@hotmail.com
188	givend Seller ID 2428813682 guangxue Nie No1701No50YuxinSouthSt JinzhouBusi Bldg17thFl HANDAN CN 56000	givend345@outlook.com
190	huanliu369 Seller ID 2080686445 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	liuhuan25@outlook.com
191	kafeng66 Seller ID 2306178826 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	zhaoxiaozhan97@outlook.com
193	lovesh159 Seller ID 2277689186 Shanshan Yan Jinzhou Busi Bldg17thFl No1702 No50 Yuxin St Hanshan District Handan Hebei CN 56001	lovesm159@outlook.com
194	lvllan1989 Seller ID 2080350393 Yanming Yuan	lvllan@outlook.com

No.	Seller	Seller's Contact Information
	No 1613 16th Fl Jinzhou Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	
195	mingsun123 Seller ID 2080353222 No 1613 16th Fl Jinzhou Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	yanmyuan@outlook.com
196	Ochilight Seller ID 2475060076 Pinghua Liu No 106 Fengze East Road Nansha Self edited No 1 Building X1301 G024534 Guangzhou CN 511458	ifnihuant@hotmail.com
201	serret8888 Seller ID 2410052404 Xiu Zhang xu lan chun tian 7 1 604 qing shan hu qu cheng nan da dao 2799 Nanchang CN 330000	serret6666@163.com
204	sunny278311 Seller ID 2299397443 Peng Xiang Ren zhen ping xian nie yang jie dao ban shi chu xue feng lu xi duan nan ce nan yang shi CN 474250	sunny210528@163.com
206	Yoloday Seller ID 2386588947 Dandan Cheng No 1603 16th Fl Jinzhou Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	yolo_days@outlook.com
207	zhan8432 Seller ID 2348925569 Zhanfeng Zhou wuchangqu wuqinghuayuan Azhuang 203hao 03 Wuhan CN 430061	zhanmoiww@outlook.com
208	zjz145 Seller ID 2244831015 Shanshan Yan Jinzhou Busi Bldg17thFl No1702 No50 Yuxin St Hanshan District Handan Hebei CN 56001	zjz19631@outlook.com

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A" HERETO,

Defendants.

Case No.: 1:24-cv-01547-ARW

Honorable Andrea R. Wood

Hearing: January 21, 2025

Time: 11:00 a.m.

**DECLARATION OF SHAWN A. MANGANO IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT**

I, Shawn A. Mangano, of the City of Las Vegas, in the State of Nevada, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Default Judgment against the non-appearing Defendants Identified in Schedule "A" (the "Motion") against which the Court has previously granted Entry of Clerk's Default on December 18, 2024 [Dkt. No. 59] against said Defendants (the "Defaulted Defendants").

3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am lead counsel for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defaulted Defendants (as defined in the accompanying Memorandum) have failed to plead or otherwise defend this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A). As a result, the Court ordered Entry of Clerk's Default on December 18, 2024 against the Defaulted Defendants. [Dkt. No. 59.] Accordingly, the Defaulted Defendants are deemed liable to Plaintiff for its asserted claims for relief for Copyright Infringement (Count I), False Designation of Origin under 35 U.S.C. §1125(a) (Count II), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count III). [Dkt. No. 23 at 8-13.]

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following four (4) federally registered copyright protected images: (1) VA0002379894; (2) VA0002379911; (3) VA0002380492; and (4) VA0002379893 (the "Copyright Protected Images").

6. As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the eBay.com online sales platform (the "Platform") to market and sell knockoff, counterfeit products resembling Plaintiff's authentic Rotita brand products through their online stores (the "Online Stores"), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

7. Plaintiff is entitled to a statutory damage award of \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image in this action. First, the Defaulted Defendants were provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend, which resulted in the Court ordering Entry of Clerk's Default against them. [Dkt. No. 59.] As a result of the Defaulted Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual

damages. This uncertainty supports Plaintiff's requested statutory damages against the Defaulted Defendants.

8. In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulted Defendants, have been acting through their counterfeit network to actively monitor and post information on the Plaintiff's pending cases on the website www.SellerDefense.cn. This has apparently been done to advise defendants in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. These circumstances reveal an overall strategy by all non-appearing defendants, including the Defaulted Defendants, to simply cut their losses where Plaintiff has a high likelihood of success, abandon any online platform restrained funds, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. Simply put, the Defaulted Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district.

9. At first, all named defendants in Plaintiff's copyright enforcement actions would vigorously fight the allegations against them, which resulted in Judge Kennelly in a parallel copyright enforcement action brought by Plaintiff concerning the a similar online sales platform that he felt compelled to set an in person hearing on the company's request for a preliminary injunction because "this Court had never seen the number of filings by opposing counsel in any other Schedule 'A' case before him." *Hong Kong Leyuzhen Technology Co. Ltd. v. The Partnerships*, Case No. 1:24-cv-02939-MFK-BWJ [Dkt. No. 80]. Oral argument in that case was handled exclusively by Joseph Droter, Esq. Since Plaintiff prevailed in obtaining preliminary injunctive relief in its case pending before Judge Kennelly, the named Schedule "A" defendants in other pending actions have either elected to settle or, as with the Defaulted Defendants, simply

failed to appear and have apparently taken the position that any recovery issued by a court is only executable against their restrained asserts on the named online platform.

10. To maximize the deterrent effect of the Court's anticipated default judgment, Plaintiff is asking that statutory damages be imposed on each individual Defaulted Defendant for each alleged infringement of the Copyright Protected Images. Such an award precludes the Defaulted Defendants from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Images. *Desire, LLC v. Manna Textiles, Inc.*, 986 F.3d 1253, 1264-1272 (9th Cir. 2021). Rather, Plaintiff expressly requests that each of the Defaulted Defendants, individually, be assessed a statutory damage award of \$5,000 for their infringement of the Copyright Protected Images.

11. Plaintiff has alleged, and has offered proof, that the Defaulted Defendants have not only engaged in the infringement of the Copyright Protected Images, but they have done so through a highly sophisticated counterfeit network. Moreover, the basic nature of the copyright infringement scheme employed demonstrates that the Defaulted Defendants not only knew of the impropriety of their conduct but had to implement their counterfeit scheme through sophisticated sources and established supply chains. This is the only possible scenario under which the Defaulted Defendants could immediately procure, without authorization, Plaintiff's new copyright protected product images and offer them for sale through their online stores.

12. The presented facts not only establish the Defaulted Defendants' knowledge and intentional infringement of Plaintiff's Copyright Protected Images. Accordingly, Plaintiff should be awarded statutory damages in the amount of \$5,000 with treble the enhancement to \$15,000 per Defaulted Defendant per infringed work based their willful infringement of the Copyright Protected Images. Attached hereto as Exhibit "1" is a chart listing all Defaulted Defendants, the

infringed Copyright Protected Image, the statutory damage amount requested per infringement, and the amount requested based on the Defaulted Defendant's willful infringement.

13. My office, with assistance from our client and those assisting our client, investigated the infringing activities of the Defaulted Defendants, including attempting to identify their contact information. Our investigation confirmed that the Defaulted Defendants are primarily domiciled in Asia. As such, I am informed and believe that the Defaulted Defendants are not active-duty members of the U.S. armed forces.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 31, 2024

By: /s/ Shawn A. Mangano
Shawn A. Mangano, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of December 2024, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, eBay.

By: /s/ Shawn A. Mangano
Shawn A. Mangano (Bar No. 6299408)

No.	Seller	Seller's Contact Information
1	applaudmiss View profile Seller ID 2071989751 Jian Liao 29Honghuishangyedasha11 JiulongXinpugangLiuhejie Hongkong 999077	ammauve19@hotmail.com
2	areaquite Seller ID 2072096370 Dan Tang RM 509 5 F IPLACE 303 CASTLE PEAK RD KWAI CHUNG NT Hong Kong 999077	aqlilac19@hotmail.com
3	arearoman Seller ID 2072462914 Dan Tang RM 509 5 F IPLACE 303 CASTLE PEAK RD KWAI CHUNG NT Hong Kong 999077	arlilac19@hotmail.com
4	arewere-37 Seller ID 1948802675 Rong wu Luohuqucuizhujiedaomutoulongshequ dongmenbeilu1050haoyinhandasha1001 shenzhenshi CN 518001	mayrotten2@outlook.com
5	babyzeal Seller ID 2116125700 Zhuoxiao Cen RM 1205 12 F TOWER 1 SILVERCORD 30 CANTON ROAD TST KL Hongkong 999077	teal20bz@hotmail.com
8	chang-9711 Seller ID 2344962223 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	changlam00@outlook.com
9	Clothes Dreamland aka Godvehicle Seller ID 2042454203 Xinjie Deng	gvwhite19@hotmail.com

No.	Seller	Seller's Contact Information
	FLAT RM 826 8 F OCEAN CENTRE HARBOUR CITY 5 CANTON ROAD TST KL Hong Kong 999077	
11	day9330 Seller ID 2533525293 Yali Xing 1610,16th Fl,Jinzhou Busi Bldg, No50 Yuxin South St,Hanshan District, Handan CN 56001	dayfami@outlook.com
13	dingxi5 Seller ID 2499431708 Yang Li Jiangxiaqujingjikaifu canglongdaokeyiyuan wuhanqiaoyakangruiyileyuan7dong6ceng14shi Wuhan CN 430000	dingxiangjie9999@outlook.co m
14	drea6677 Seller ID 2497672408 Dandan Cheng No 1603,16th Fl,Jinzhou Busi Bldg,No 50 Yuxin South St, Hanshan District, Handan,Hebei CN 56001	drea123m@outlook.com
15	dreamyhouse888 Seller ID 1972980942 shao na zhou fengzequ chengdongjiedaoxifushequ xifulu 8hao xuefushangcheng 1zhuang 2702shi fujiansheng quanzhoushi CN 362000	18965503262@163.com
17	eagover22rk Seller ID 2487747605 Jian Liao UNIT 1011 12 10 F CHEVALIER COMMERCIAL CENTRE 8 WANG HOI ROAD KOWLOON BAY KL Hongkong 999077	oceanfeo@hotmail.com
18	eingtill27rk Seller ID 2489292915 Jian Liao UNIT 1011 12 10 F CHEVALIER COMMERCIAL CENTRE 8 WANG HOI ROAD KOWLOON BAY KL Hongkong 999077	timefet@hotmail.com
21	fivestarshopping Seller ID 2336352227 Fangyu Li ngtoushequBantianjiedao Tiananyunguerqi1 Shenzhen CN 518129	phoebehurt@163.com
22	foreverhome88 Seller ID 2325311774 Yancai Huang Tiananyungu Erqi 02 08 11 1408 Longgangqu Bantianjiedao Gangtoushequ Shenzhen CN 518129	kamawhat@163.com
23	fqz7zonkx Seller ID 2563396938 Qihong Lu 6 F MANULIFE PLACE 348 KWUN TONG ROAD KL Hongkong 999077	qzero23@hotmail.com
24	frdroadd Seller ID 2428219458 Jianjun Li 6/F, Manulife Place, 348 Kwun Tong Rd., KLN Hong Kong 999077	frddan22jb@hotmail.com
25	frirising Seller ID 2430619042 Jianjun Li	friitem22jb@hotmail.com

No.	Seller	Seller's Contact Information
	6/F, Manulife Place, 348 Kwun Tong Rd., KLN Hong Kong 999077	
28	Generalfox Official Seller ID 2036271691 Yaqin Huang FLAT RM 1318 19 13 F HOLLYWOOD PLAZA 610 NATHAN ROAD MONG KOK KL Hong Kong 999077	gfbeige19@hotmail.com
29	GM07 Seller ID 2053151564 Taomei Wang 2R707 Renmin Road Yuanhe BuildingFanhuaC Suzhou CN 215000	plannedtoleave@outlook.com
32	HSymmind Seller ID 2578668276 JIE PENG dongshengzhenzhihedonglu5haoerlou201 zhongshanshi Guangdong CN 528414	ymmindhs@163.com
33	huashixin Seller ID 2387782503 Tao Lin jingzhoushijinyuanshijicheng5qu5dong2704 jingzhoushi CN 434000	lintao1771908630@163.com
34	in.marry Seller ID 1019214757 Xueli chen ju mao jie 185 hao huo li shang wu guang chang C dong 4 lou 426 shi su zhou shi CN 215000	wlsz2013@outlook.com
35	jakobautobest Seller ID 2072062866 Songyu Kang gongyeyuanqu cuiyuanlu 181hao shanglvdasha 6zhuang 606shi jiangsu Suzhou CN 215000	fantasticwwo911@outlook.com
38	junhu-1910 Seller ID 2340701119 Junhui Chen Fu Wu Bin Hai Wei 3910 Shi Dong Li Qu Ping Ying Lu 8 Hao Tian Jin Shi CN 300300	junhuic2021@outlook.com
39	junesock3js Seller ID 2122449645 Jianjun Li 6 F MANULIFE PLACE 348 KWUN TONG ROAD KL Hongkong 999077	palejjs67@hotmail.com
41	king-9527 Seller ID 2553109378 Yuebo Chen Zengduqunanjiaobanshichuqing nianxilu449haozizhuchengnuoshenbao suizhoushi CN 441399	gusetui@163.com
42	koodyy Seller ID 2533522643 Yali Xing 1610,16th Fl,Jinzhou Busi Bldg, No50 Yuxin South St,Hanshan District, Handan CN 56001	kook489@outlook.com
43	Lanm Tool Seller ID 2303519081 Lanmin Zhang jingjikaifaqucanglongdao27haoqiyezongbu jidiyiqi minghong 13dong1lou1037shi Hubeisheng Wuhan Shi Jiangxiaqu CN 430200	zhanglanlan853@outlook.com

No.	Seller	Seller's Contact Information
45	lilia_3329 Seller ID 2526909745 Qin wang shengchanxiangmu 11-3-B22hao dongxihuqu jinghebanshichu wujinlu 171hao wuhan CN 430000	lilian5221@outlook.com
47	lintao Seller ID 2390536828 Tao Lin jingzhoushijinyuanshijicheng5qu5dong2704 jingzhoushi CN 434000	lt1771908630@163.com
48	lily_7419 Seller ID 2344254559 Yang Li canglongdaokeyiyuan wuhanqiaoyakangrui yileyuan7dong6ceng14shi Wuhanhijiangxiaqujingjikaifaqu CN 430000	lilynga87@outlook.com
51	lyshu81 Seller ID 2322441260 Yang Li canglongdaokeyiyuan wuhanqiaoyakangrui yileyuan7dong6ceng14shi Wuhanhijiangxiaqujingjikaifaqu CN 430000	lyshun2021@outlook.com
54	maoming8 Seller ID 2306195898 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	lulanlan176@outlook.com
56	minke23mk Seller ID 2216543767 Dongyang Ban FLAT RM 605 6 F EASEY COMMERCIAL BUILDING 253 261 HENNESSY ROAD WANCHAI Hong Kong 999077	e23mkin@hotmail.com
61	nttasty12nt Seller ID 2236752092 Xiqiang Liu UNIT 83 3 F YAU LEE CENTER NO 45 HOI YUEN ROAD KWUN TONG KL Hong Kong 999077	funfntxi@hotmail.com
62	nvictory12nv Seller ID 2237255058 Xiqiang Liu UNIT 83 3 F YAU LEE CENTER NO 45 HOI YUEN ROAD KWUN TONG KL Hong Kong 999077	funfnvxi@hotmail.com
63	ochgoodway Seller ID 2468748896 Pinghua Liu No 106 Fengze East Road Nansha Self edited No 1Building X1301 G024534 Guangzhou CN 511458	comenewcloud@hotmail.com
64	Paieasy Official Seller ID 1663098111 Jianhua Li Nanhai Guicheng Baoshixilu 1hao Cshidai Nanhaihulianwangchanye 2zuo zonghelou FOSHAN CN 528000	peservice360@hotmail.com

No.	Seller	Seller's Contact Information
65	PLUM73PRO Seller ID 1952764223 Guimei Liu Futianjiedaofushanshequbinhedadao 5022haolianheguangchangAzuo26ceng11aj Shenzhenshifutianqu CN 518033	ricegogruel2@outlook.com
66	questeasy Seller ID 1800567954 Weihong Jiang FLAT RM604 6 F EASEY COMMERCIAL BUILDING 253 261 HENNESSY ROAD WANCHAI HK Hong Kong 999077	qepeace0602@hotmail.com
67	quickyoun Seller ID 2560387210 Xin Ren gaoxinqulongxinglu555haolongxingyiju4hao lou2danyuan401 hengshuishi CN 53010	qxrrpnrnjz@outlook.com
68	ratidee Seller ID 2499147816 Wuchangqu xujiapengjie sanjiaolucun fuxinghuiyu shuianguoji 4haodikuai 2dong30ceng1hao-4 Wuhan CN 430061	several846@outlook.com
70	salessgoods Seller ID 2338928295 Bishu Cheng Guangzhoushitianhequcencunsonggang dajie7haoc1791shi GUANGZHOU CN 510000	liangmuqing77@outlook.com
71	samess07rk Seller ID 2485448642 Jian Liao UNIT 1011 12 10 F CHEVALIER COMMERCIAL CENTRE 8 WANG HOI ROAD KOWLOON BAY KL Hong Kong 999077	standfss@hotmail.com
72	sevenscolorslife Seller ID 1068977577 Caili Liu tiananyunguerqi 11dong1403C gangtoushequ bantianjiedao longgangqu shenzhenshi CN 518129	lei.simplelife@gmail.com
74	shunbor Seller ID 2033407307 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	shiguanqun199@outlook.com
75	summer432 Seller ID 2524146024 Yan Guo 1611-2,16th Fl,Jinzhou Busi Bldg, No50 Yuxin South St,Hanshan District, Handan, CN 56001	summer9321@outlook.com
76	sus-136064 Seller ID 2331333875 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	suspe10@outlook.com
77	takemetoyou Seller ID 1649243101 Luming Yin yongxianglu 6xiang 8hao 1201 bantianjiedao longgangqu shenzhenshi CN 518129	takemetoyou720@hotmail.com

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79	thel5045 Seller ID 2339662285 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	thelastnb@outlook.com
80	weyiqi Seller ID 2037344846 Jia Li No 1704 17th Fl Jinzhou Int Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	yiqiltd@outlook.com
81	worldicon Seller ID 1625761416 Jianjun Li Nanhaiqu guichengjiedao haiwulu 28haohua nanguojijinrongzhongxin 2zhuang 915 916 Foshan CN 322000	wi_24service@163.com
82	xixu88y Seller ID 2499393591 Zhanfeng Zhao Wuchangqu WuqinghuayuanAzhuang203hao-03 Wuhan CN 430061	xiaoxue8896@outlook.com
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86	yes244 Seller ID 2507302566 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	lsy1981109991@outlook.com
87	yie-25 Seller ID 2326616337 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	yiermm@outlook.com
90	znustore Seller ID 1099157654 Jianjun Li Nanhaiqu guichengjiedao haiwulu 28haohua nanguojijinrongzhongxin 2zhuang 915 916 Foshan CN 528000	zs_24service@163.com
91	ZZhug520 Seller ID 1948397777 Shao Na Zhou fengzequ chengdongjiedaoxifushequ xifulu 8hao xuefushangcheng 1zhuang 2702shi fujiansheng quanzhoushi CN 362000	18698395002@163.com
92	adafaa Seller ID 2506956131 Yi Liu No 1615,16th Fl,Jinzhou Busi Bldg,No50 Yuxin South St, Hanshan District, Handan, Hebei CN 56001	afafaffd121@outlook.com
93	Allen s-stone Seller ID 1367882143 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN	zhongbiaolt02@sina.com

No.	Seller	Seller's Contact Information
	322000	
94	angulzhe Seller ID 2294605866 fachang zhi fanjiajinglujiaadunxincun 5 No9 floor4 zhushanqujingchengzhen jing de zhen CN 333000	xb575327@21cn.com
95	ayuniu658 Seller ID 2266873736 baofang zhi Zi Shi Road 1589 floor 5 Xin Jian Qu Nan Chang CN 330000	tong0996588@163.com
96	bownes111 Seller ID 2410529489 xiu zhang xu lan chun tian 7 1 604 qing shan hu qu cheng nan da dao 2799 nanchang CN 330000	bownes000@163.com
97	changlan5 Seller ID 2306197327 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	luxiaochang977@outlook.com
98	cll_169 Seller ID 2326611820 Changlan Lu linjiangdadao98hao wuhanjiyuqiao wandaguangchang2qi9dong22ceng1shi 05hao wuhan CN 430061	cll726o@outlook.com
99	colsew Seller ID 1512355087 Xuewen wang Henansheng Lushanxian ranghexiang chenloucun bazu 106 hao Pingdingshan CN 467300	wanjiamaoqi_vip@163.com
100	DD.DIY.BEADS Seller ID 2204065434 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	glass1331@163.com
101	dzdl_31 Seller ID 2339658057 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	dzdlzysdk@outlook.com
102	EDC world store/zhaoyi9572 Seller ID 2193033932 Yi De Zhao zhen ping xian xue feng jie dao ban shi chu xu qiao bei ce CN474250	zhaoyide2020@126.com
103	fefeas2 shop Seller ID 2160528602 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	waxxxxawwx@163.com

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107	gcleahis Seller ID 2563384489 Shuyan jia 2F 79 Building 210Tairan Industrial Zone Shennan West Road Shatou Street Futian Shenzhen 广东省 CN 518000	qarsffgr@outlook.com
108	hanhe654 Seller ID 2384917434 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	hanshewei456@outlook.com
109	hanyanye shop Seller ID 2160811647 Haifeng Wang wolongquwuhoujiedaozhongzhouxilu639hao jinghuayuanxiaoku8haolou2danyuan101shi henanshengnanyangshi CN 473000	1106789666@qq.com
110	hello20200928 shop Seller ID 2205244389 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	aderc886@163.com
111	if-you-need-DIY Seller ID 2152432518 Dalu Xin beiyuanstreet chunhua rod 588 C1 501 Jinhua Yiwu CN 322000	fafases@163.com
112	if-you-need-watch/sousoux Seller ID 2152443044 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	wsxwsxasa@163.com
113	James-and-Smith Seller ID 1944893869 Dalu Xin zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	james44556@sina.com
114	jellycabin Seller ID 1812220947 Jianjun Li 6 F MANULIFE PLACE 348 KWUN TONG ROAD KL Hongkong 999077	jcdevoted1314@hotmail.com
115	jewelry_home888 Seller ID 1013603445 Changping Wang beiyuanstreet chunhua rod 588 C1 501 Jinhua Yiwu CN 322000	womanhome888@sina.com
116	jianbiaostore Seller ID 2512702648 Jianbiao Chen jiangbeiqufenganlu5hao2-451shi ningboshi CN 315032	pmgxrjim@outlook.com

No.	Seller	Seller's Contact Information
118	jngunlai Seller ID 2564524380 yanli guo Bldg.2,Guangyayuan Industrial Zone,Guangyayuan Rd,Longgang Shenzhen CN 518000	afagkgiy@outlook.com
119	kaai776 Seller ID 2306176422 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	zhaofengfeng149@outlook.com
120	kevinlee468 shop Seller ID 2205259570 Dalu Xin beiyuanstreet chunhua rod 588 C1 501Jinhua Yiwu CN 322000	dongdong694@163.com
123	lb2020lbnb shop Seller ID 2205285108 zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	number718@163.com
125	Linda-and-Betty Seller ID 1944968480 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	lindaandbetty@sina.com
126	llk212 shop Seller ID 2160512394 Dalu Xin zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	asxxasxxd@163.com
127	luck-time Seller ID 1476808090 zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	timelosttime@sina.com
128	mmaylay Seller ID 2497493053 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	mmaylay_30@outlook.com
130	msmsmsd Seller ID 2523647617 Yali Xing 1610,16th Fl,Jinzhou Busi Bldg, No50 Yuxin South St,Hanshan District, Handan CN 56001	msmsms199@outlook.com
131	mwangg3k Seller ID 2294604509 Fachang Zhi fanjiajinglujiaidunxincun 5 No9 floor4 zhushanqujingchengzhen jing de zhen CN 333000	bi410924@21cn.com
132	mwangky9 Seller ID 2266870408 Fachang Zhi fanjiajinglujiaidunxincun 5 No9 floor4 zhushanqujingchengzhen jing de zhen CN 333000	dongjue7363@163.com

No.	Seller	Seller's Contact Information
133	ninieed Seller ID 2549081987 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	cniniee@outlook.com
134	pinch_2341 Seller ID 2330938188 Lanmin Zhang jingjikaifaqucanglongdao27haoqiyezongbu jidiyiqi minghong 13dong1lou1037shi Hubeisheng Wuhanshi Jiangxiaqu CN 430200	pinchanxin@outlook.com
135	poiumn Seller ID 2497398537 Yali Xing 1610 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	poiulmn320@outlook.com
136	qzhouruihan Seller ID 2320240802 Xiaoying Wang ling shi cun ying jun lu 13 hao shi shi shi ling xiu zhen quan zhou shi CN 362700	al75420@21cn.com
137	ralumm Seller ID 2523636082 Yali Xing 1610,16th Fl,Jinzhou Busi Bldg, No50 Yuxin South St,Hanshan District, Handan CN 56001	ranliu05012@outlook.com
138	robinett1234 Seller ID 2410541912 Meifang Huang xian you xian du wei zhen tan bian jie 45 hao pu tian shi CN 351200	robinett333@163.com
139	s8665s shop Seller ID 2150149298 Dalu Xin zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	vbc685985@163.com
142	shijie2023 Seller ID 2152396932 Chang Ping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	cerdamd@163.com
145	swtinf-47 Seller ID 2348939495 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	swtinfengzhao@outlook.com
146	tolili7 Seller ID 2497400380 Yali Xing 1610 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	tolili2323@outlook.com
147	ttyttes shop Seller ID 2152593685 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN	nnbsdswq@163.com

No.	Seller	Seller's Contact Information
	322000	
148	vk55825 shop Seller ID 2205242764 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	bead1456@163.com
149	waxxcd Seller ID 2158955896 Changping wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	llkaasd@163.com
150	welcome_to_order shop Seller ID 1226202251 Dalu Xin beiyuanstreet chunhua rod 588 C1 501 Jinhua Yiwu CN 322000	lixiaohui8868@sina.com
151	wernette123 Seller ID 2411111780 Xiu Zhang xu lan chun tian 7 1 604 qing shan hu qu cheng nan da dao 2799 Nanchang CN 330000	wernette555@126.com
153	wujiwsw shop Seller ID 2152539810 Dalu Xin beiyuanstreet chunhua rod 588 C1 501 Jinhua Yiwu CN 322000	fdssdsasw@163.com
156	xgad335 Seller ID 2505777339 Xiaoyan Sun Wuchangqu Zhongnanlu7hao 29cengB01hao-02 Wuhan CN 430061	xga002034@outlook.com
157	xiao1xiao1 shop Seller ID 2158976453 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	zzxxccsww@163.com
158	xiaoj4302 Seller ID 2525843292 Jihua Xiao di D zhuang 1danyuan 21ceng11haofang-E096 ketingxiaoxinghuizhazhongxin wuhan CN 430000	xiaojihua19@outlook.com
159	xiaoxiaobai288 shop Seller ID 2152565261 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	cdcdcdwww@163.com
160	xiaozhi2020 shop Seller ID 2152375460 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	mamsan@163.com

No.	Seller	Seller's Contact Information
161	xinshop Seller ID 2560387210 Xin Ren gaoxinqulongxinglu555haolongxingyiju4hao lou2danyuan401 hengshuishi, Hebei CN 53010	qxrrprnrjz@outlook.com
162	xlz895 Seller ID 2244811259 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	xlzh16@outlook.com
163	xxdxx2 shop Seller ID 2158934040 Changping Wang zhongguozhejiangziyoumaoyishiyanyujinhuashiyiwushi limingsanqu40dong5danyuan205shi yiwu 浙江省 CN 322000	dddxxws222@163.com
164	yandee Seller ID 2504580565 Jinxu Lu No.50,Yuxin South St.,Hanshan NO.1616 Jinzhou Business Bldg, handan Hebei CN 56000	xiaoguoba778@outlook.com
165	yidihi Seller ID 2524185912 Yan Guo 1611 2 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Handan CN 56001	yidihi99@outlook.com
166	yiqp33 Seller ID 2340681718 Pengyi Bi qiaokouqubaofengerlu74haoA244 Wuhan CN 43000	yiqpeng34@outlook.com
167	yngdgg Seller ID 2497428252 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	yangdong753@outlook.com
168	zhaokp18 Seller ID 2302108160 Yi De Zhao zhen ping xian xue feng jie dao ban shi chu xu qiao bei ce CN474250	abcoutdoor@163.com
169	zhongbiaoltd shop Seller ID 1367842756 Dalu Xin beiyuanstreet chunhua rod 588 C1 501Jinhua Yiwu CN 322000	zhongbiaoltd01@sina.com
170	zhongbiaomaoyi.ltd shop Seller ID 2150079338 Dalu Xin beiyuanstreet chunhua rod 588 C1 501Jinhua Yiwu CN 322000	zhongbiaomaoyi@163.com
174	mifitu Seller ID 2533533368 Jiqing Zhang No 1617,16th Fl, Jinzhou Busi Bldg, No 50 Yuxin South St, Hanshan District Handan, Hebei, CN 56001	mifituu@outlook.com
175	newlife1848 Seller ID 2008485996 Qlao Wang henanshengnanyangshizhenpingxinxuefengyushenlu	xiaomao99@126.com

No.	Seller	Seller's Contact Information
	nanduanyujinghuachengyiqidongmenmian107 Nanyang CN 474250	
176	qazxc6 Seller ID 2534695044 Caihong Yao Henanshengpingdingshanshilushanxianranghexiangchenlouc unbazu pingdingshan CN 467300	caihongmaoyi_vip@163.com
177	rebern Seller ID 2507267004 Yang Li Jiangxiaqujingjikaifaqu canglongdaokeyiyuan wuhanqiaoyakangruiyileyuan7dong6ceng14shi Wuhan CN 430000	rebernyp@outlook.com
178	shwa520109 Seller ID 2328972903 Xiangbin Zhang qiaokouqu gutianerlu changtianlu5hao yiceng14shi Wuhan CN 430030	shwagole1@outlook.com
180	wuying130 Seller ID 2080690123 Dandan Cheng No 1603,16th Fl, Jinzhou Busi Bldg, No 50 Yuxin South St, Hanshan District, Handan, Hebei CN 56001	wuyingying130@outlook.com
181	yananlssqian Seller ID 2277659053 Zhenyu he ZhongHaiXiAnxiaoqu 4 2 301 XIHu Qu LeiChi Road 666 Nan Chang CN 330000	ykj414351@21cn.com
183	ainnee35 Seller ID 2277690756 Shanshan Yan Jinzhou Busi Bldg17thFl No1702 No50 Yuxin St Hanshan District Handan Hebei CN 56001	ainnee357@outlook.com
184	crytall Seller ID 2398942506 CHAO PAN Room 401 389 Jihua Road Buji street Longgang District SHENZHEN CN 518000	crystaljool@hotmail.com
188	givend Seller ID 2428813682 guangxue Nie No1701No50YuxinSouthSt JinzhouBusi Bldg17thFl HANDAN CN 56000	givend345@outlook.com
190	huanliu369 Seller ID 2080686445 Xiaolu Zhao No 1606 16th Fl Jinzhou Busi Bldg No50 Yuxin South St Hanshan District Handan Hebei CN 56001	liuhuan25@outlook.com
191	kafeng66 Seller ID 2306178826 Zhanfeng Zhao wuchangqu wuqinghuayuan Azhuang 203hao 03 wuhan CN 430061	zhaoxiaozhan97@outlook.com
193	lovesh159 Seller ID 2277689186 Shanshan Yan Jinzhou Busi Bldg17thFl No1702 No50 Yuxin St Hanshan District Handan Hebei CN 56001	lovesm159@outlook.com

No.	Seller	Seller's Contact Information
194	lvllan1989 Seller ID 2080350393 Yanming Yuan No 1613 16th Fl Jinzhou Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	lvllan@outlook.com
195	mingsun123 Seller ID 2080353222 No 1613 16th Fl Jinzhou Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	yanmyuan@outlook.com
196	Ochilight Seller ID 2475060076 Pinghua Liu No 106 Fengze East Road Nansha Self edited No 1Building X1301 G024534 Guangzhou CN 511458	ifnihuant@hotmail.com
201	serret8888 Seller ID 2410052404 Xiu Zhang xu lan chun tian 7 1 604 qing shan hu qu cheng nan da dao 2799 Nanchang CN 330000	serret6666@163.com
204	sunny278311 Seller ID 2299397443 Peng Xiang Ren zhen ping xian nie yang jie dao ban shi chu xue feng lu xi duan nan ce nan yang shi CN 474250	sunny210528@163.com
206	Yoloday Seller ID 2386588947 Dandan Cheng No 1603 16th Fl Jinzhou Busi Bldg No 50 Yuxin South St Hanshan District Handan Hebei CN 56001	yolo_days@outlook.com
207	zhan8432 Seller ID 2348925569 Zhanfeng Zhou wuchangqu wuqinghuayuan Azhuang 203hao 03 Wuhan CN 430061	zhanmoiww@outlook.com
208	zjz145 Seller ID 2244831015 Shanshan Yan Jinzhou Busi Bldg17thFl No1702 No50 Yuxin St Hanshan District Handan Hebei CN 56001	zjz19631@outlook.com

Exhibit 1

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
1	applaudmissView profile Seller ID 2071989751 Jian Liao	VA0002379894	\$5,000.00	Total: \$15,000.00
2	areaquite Seller ID 2072096370 Dan Tang	VA0002379894	\$5,000.00	Total: \$15,000.00
3	arearoman Seller ID 2072462914 Dan Tang	VA0002379894	\$5,000.00	Total: \$15,000.00
4	arewere-37 Seller ID 1948802675 Rong wu	VA0002379894	\$5,000.00	Total: \$15,000.00
5	babyzeal Seller ID 2116125700 Zhuoxiao Cen	VA0002379894 VA0002379911	\$5,000.00 x2	Total: \$30,000.00
8	chang-9711 Seller ID 2344962223 Changlan Lu	VA0002379894	\$5,000.00	Total: \$15,000.00
9	Clothes Dreamland aka Godvehicle Seller ID 2042454203 Xinjie Deng	VA0002379894	\$5,000.00	Total: \$15,000.00
11	day9330 Seller ID 2533525293 Yali Xing	VA0002379894	\$5,000.00	Total: \$15,000.00
13	dingxi5 Seller ID 2499431708 Yang Li	VA0002379894	\$5,000.00	Total: \$15,000.00
14	drea6677 Seller ID 2497672408 Dandan Cheng	VA0002379894	\$5,000.00	Total: \$15,000.00
15	dreamyhouse888 Seller ID 1972980942 shao na zhou	VA0002379894	\$5,000.00	Total: \$15,000.00
17	eagover22rk Seller ID 2487747605 Jian Liao	VA0002379894 VA0002379911	\$5,000.00 x2	Total: \$30,000.00
18	eingtill27rk Seller ID 2489292915 Jian Liao	VA0002379894	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
21	fivestarshopping Seller ID 2336352227 Fangyu Li	VA0002379894	\$5,000.00	Total: \$15,000.00
22	foreverhome88 Seller ID 2325311774 Yancai Huang	VA0002379894	\$5,000.00	Total: \$15,000.00
23	fqz7zonkx Seller ID 2563396938 Qihong Lu	VA0002379894	\$5,000.00	Total: \$15,000.00
24	frdroadd Seller ID 2428219458 Jianjun Li	VA0002379894	\$5,000.00	Total: \$15,000.00
25	frirising Seller ID 2430619042 Jianjun Li	VA0002379894	\$5,000.00	Total: \$15,000.00
28	Generalfox Official Seller ID 2036271691 Yaqin Huang	VA0002379894	\$5,000.00	Total: \$15,000.00
29	GM07 Seller ID 2053151564 Taomei Wang	VA0002379894	\$5,000.00	Total: \$15,000.00
32	HSymmind Seller ID 2578668276 JIE PENG	VA0002379894	\$5,000.00	Total: \$15,000.00
33	huashixin Seller ID 2387782503 Tao Lin	VA0002379894	\$5,000.00	Total: \$15,000.00
34	in.marry Seller ID 1019214757 Xueli chen	VA0002379894	\$5,000.00	Total: \$15,000.00
35	jakobautobest Seller ID 2072062866 Songyu Kang	VA0002379894	\$5,000.00	Total: \$15,000.00
38	junhu-1910 Seller ID 2340701119 Junhui Chen	VA0002379894	\$5,000.00	Total: \$15,000.00
39	junesock3js Seller ID 2122449645 Jianjun Li	VA0002379894	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
41	king-9527 Seller ID 2553109378 Yuebo Chen	VA0002379894	\$5,000.00	Total: \$15,000.00
42	koodyy Seller ID 2533522643 Yali Xing	VA0002379894	\$5,000.00	Total: \$15,000.00
43	Lanm Tool Seller ID 2303519081 Lanmin Zhang	VA0002379894	\$5,000.00	Total: \$15,000.00
45	lilia_3329 Seller ID 2526909745 Qin wang	VA0002379894	\$5,000.00	Total: \$15,000.00
47	lintao Seller ID 2390536828 Tao Lin	VA0002379894	\$5,000.00	Total: \$15,000.00
48	lly_7419 Seller ID 2344254559 Yang Li	VA0002379894	\$5,000.00	Total: \$15,000.00
51	lyshu81 Seller ID 2322441260 Yang Li	VA0002379894	\$5,000.00	Total: \$15,000.00
54	maoming8 Seller ID 2306195898 Changlan Lu	VA0002379894	\$5,000.00	Total: \$15,000.00
56	minke23mk Seller ID 2216543767 Dongyang Ban	VA0002379894	\$5,000.00	Total: \$15,000.00
61	nttasty12nt Seller ID 2236752092 Xiqiang Liu	VA0002379894	\$5,000.00	Total: \$15,000.00
62	nvvictory12nv Seller ID 2237255058 Xiqiang Liu	VA0002379894	\$5,000.00	Total: \$15,000.00
63	ochgoodway Seller ID 2468748896 Pinghua Liu	VA0002379894	\$5,000.00	Total: \$15,000.00
64	Paieasy Official Seller ID 1663098111 Jianhua Li	VA0002379894	\$5,000.00	Total: \$15,000.00
65	PLUM73PRO Seller ID 1952764223 Guimei Liu	VA0002379894	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
66	questeasy S eller ID 1800567954 Weihong Jiang	VA0002379894	\$5,000.00	Total: \$15,000.00
67	quickyong Seller ID 2560387210 Xin Ren	VA0002379894	\$5,000.00	Total: \$15,000.00
68	ratidee Seller ID 2499147816	VA0002379894	\$5,000.00	Total: \$15,000.00
70	salessgoods Seller ID 2338928295 Bishu Cheng	VA0002379894 VA0002379911	\$5,000.00 x2	Total: \$30,000.00
71	samess07rk Seller ID 2485448642 Jian Liao	VA0002379894	\$5,000.00	Total: \$15,000.00
72	sevendcolorslife Seller ID 1068977577 Caili Liu	VA0002379894	\$5,000.00	Total: \$15,000.00
74	shunbor Seller ID 2033407307 Yan Guo	VA0002379894	\$5,000.00	Total: \$15,000.00
75	summer432 Seller ID 2524146024 Yan Guo	VA0002379894	\$5,000.00	Total: \$15,000.00
76	sus-136064 Seller ID 2331333875 Changlan Lu	VA0002379894	\$5,000.00	Total: \$15,000.00
77	takemetoyou Seller ID 1649243101 Luming Yin	VA0002379894	\$5,000.00	Total: \$15,000.00
79	thel5045 Seller ID 2339662285 Zhanfeng Zhao	VA0002379894 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
80	weyiqi Seller ID 2037344846 Jia Li	VA0002379894 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
81	worldicon Seller ID 1625761416 Jianjun Li	VA0002379894 VA0002379911	\$5,000.00 x2	Total: \$30,000.00
82	xixu88y Seller ID 2499393591 Zhanfeng Zhao	VA0002379894 VA0002379911	\$5,000.00 x2	Total: \$30,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
83	xyli-007 Seller ID 2081055763 Yali Xing	VA0002379894	\$5,000.00	Total: \$15,000.00
86	yes244 Seller ID 2507302566 Yan Guo	VA0002379894 VA0002380492	\$5,000.00 x2	Total: \$30,000.00
87	yie-25 Seller ID 2326616337 Changlan Lu	VA0002379894	\$5,000.00	Total: \$15,000.00
90	znustore Seller ID 1099157654 Jianjun Li	VA0002379894	\$5,000.00	Total: \$15,000.00
91	ZZhug520 Seller ID 1948397777 Shao Na Zhou	VA0002379894	\$5,000.00	Total: \$15,000.00
92	adafaa Seller ID 2506956131 Yi Liu	VA0002379911	\$5,000.00	Total: \$15,000.00
93	Allen s-stone Seller ID 1367882143 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
94	angulzhe Seller ID 2294605866 fachang zhi	VA0002379911	\$5,000.00	Total: \$15,000.00
95	ayuniu658 Seller ID 2266873736 baofang zhi	VA0002379911	\$5,000.00	Total: \$15,000.00
96	bownes111 Seller ID 2410529489 xiu zhang	VA0002379911	\$5,000.00	Total: \$15,000.00
97	changlan5 Seller ID 2306197327 Changlan Lu	VA0002379911	\$5,000.00	Total: \$15,000.00
98	cll_169 Seller ID 2326611820 Changlan Lu	VA0002379911	\$5,000.00	Total: \$15,000.00
99	colsew Seller ID 1512355087 Xuewen wang	VA0002379911 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
100	DD.DIY.BEADS Seller ID 2204065434 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
101	dzdl_31 Seller ID 2339658057 Zhanfeng Zhao	VA0002379911 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
102	EDC world store/zhaoyi9572 Seller ID 2193033932 Yi De Zhao	VA0002379911	\$5,000.00	Total: \$15,000.00
103	fefeaas2 shop Seller ID 2160528602 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
106	fufu8873 Seller ID 2283798910 Yang Yang	VA0002379911	\$5,000.00	Total: \$15,000.00
107	gcileahis Seller ID 2563384489 Shuyan jia	VA0002379911	\$5,000.00	Total: \$15,000.00
108	hanhe654 Seller ID 2384917434 Xiaolu Zhao	VA0002379911	\$5,000.00	Total: \$15,000.00
109	hanyanye shop Seller ID 2160811647 Haifeng Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
110	hello20200928 shop Seller ID 2205244389 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
111	if-you-need-DIY Seller ID 2152432518 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
112	if-you-need-watch/sousouxdd Seller ID 2152443044 Changping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
113	James-and-Smith Seller ID 1944893869 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
114	jellycabin Seller ID 1812220947 Jianjun Li	VA0002379911	\$5,000.00	Total: \$15,000.00
115	jewelery_home888 Seller ID 1013603445 Changping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
116	jianbiaostore Seller ID 2512702648 Jianbiao Chen	VA0002379911	\$5,000.00	Total: \$15,000.00
118	jngunlai Seller ID 2564524380 yanli guo	VA0002379911	\$5,000.00	Total: \$15,000.00
119	kaai776 Seller ID 2306176422 Zhanfeng Zhao	VA0002379911	\$5,000.00	Total: \$15,000.00
120	kevinlee468 shop Seller ID 2205259570 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
123	lb2020lbnb shop Seller ID 2205285108	VA0002379911	\$5,000.00	Total: \$15,000.00
125	Linda-and-Betty Seller ID 1944968480 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
126	llk212 shop Seller ID 2160512394 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
127	luck-time Seller ID 1476808090	VA0002379911	\$5,000.00	Total: \$15,000.00
128	mmaylay Seller ID 2497493053 Yan Guo	VA0002379911	\$5,000.00	Total: \$15,000.00
130	msmsmsd Seller ID 2523647617 Yali Xing	VA0002379911	\$5,000.00	Total: \$15,000.00
131	mwanggg3k Seller ID 2294604509 Fachang Zhi	VA0002379911	\$5,000.00	Total: \$15,000.00
132	mwangky9 Seller ID 2266870408 Fachang Zhi	VA0002379911	\$5,000.00	Total: \$15,000.00
133	ninieed Seller ID 2549081987 Yan Guo	VA0002379911	\$5,000.00	Total: \$15,000.00
134	pinch_2341 Seller ID 2330938188 Lanmin Zhang	VA0002379911	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
135	poiumn Seller ID 2497398537 Yali Xing	VA0002379911	\$5,000.00	Total: \$15,000.00
136	qzhouruihan Seller ID 2320240802 Xiaoying Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
137	ralumm Seller ID 2523636082 Yali Xing	VA0002379911	\$5,000.00	Total: \$15,000.00
138	robinett1234 Seller ID 2410541912 Meifang Huang	VA0002379911	\$5,000.00	Total: \$15,000.00
139	s8665s shop Seller ID 2150149298 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
142	shijie2023 Seller ID 2152396932 Chang Ping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
145	swtinf-47 Seller ID 2348939495 Zhanfeng Zhao	VA0002379911	\$5,000.00	Total: \$15,000.00
146	tolili7 Seller ID 2497400380 Yali Xing	VA0002379911	\$5,000.00	Total: \$15,000.00
147	ttyttes shop Seller ID 2152593685 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
148	vk55825 shop Seller ID 2205242764 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
149	waxxcd Seller ID 2158955896 Changping wang	VA0002379911	\$5,000.00	Total: \$15,000.00
150	welcome_to_order shop Seller ID 1226202251 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
151	wernette123 Seller ID 2411111780 Xiu Zhang	VA0002379911	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
153	wujiwsw shop Seller ID 2152539810 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
156	xgad335 Seller ID 2505777339 Xiaoyan Sun	VA0002379911	\$5,000.00	Total: \$15,000.00
157	xiao1xiao1 shop Seller ID 2158976453 Changping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
158	xiaoj4302 Seller ID 2525843292 Jihua Xiao	VA0002379911	\$5,000.00	Total: \$15,000.00
159	xiaoxiaobai288 shop Seller ID 2152565261 Changping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
160	xiaozhi2020 shop Seller ID 2152375460 Changping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
161	xinshop Seller ID 2560387210 Xin Ren	VA0002379911	\$5,000.00	Total: \$15,000.00
162	xlz895 Seller ID 2244811259 Xiaolu Zhao	VA0002379911 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
163	xxdxx2 shop Seller ID 2158934040 Changping Wang	VA0002379911	\$5,000.00	Total: \$15,000.00
164	yandee Seller ID 2504580565 Jinxu Lu	VA0002379911	\$5,000.00	Total: \$15,000.00
165	yidihi Seller ID 2524185912 Yan Guo	VA0002379911	\$5,000.00	Total: \$15,000.00
166	yiqp33 Seller ID 2340681718 Pengyi Bi	VA0002379911	\$5,000.00	Total: \$15,000.00
167	yngdgg Seller ID 2497428252 Xiaolu Zhao	VA0002379911	\$5,000.00	Total: \$15,000.00
168	zhaokp18 Seller ID 2302108160 Yi De Zhao	VA0002379911	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
169	zhongbiaoltd shop Seller ID 1367842756 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
170	zhongbiaomaoyi.ltd shop Seller ID 2150079338 Dalu Xin	VA0002379911	\$5,000.00	Total: \$15,000.00
174	mifitu Seller ID 2533533368 Jiqing Zhang	VA0002380492	\$5,000.00	Total: \$15,000.00
175	newlife1848 Seller ID 2008485996 Qlao Wang	VA0002380492	\$5,000.00	Total: \$15,000.00
176	qazxc6 Seller ID 2534695044 Caihong Yao	VA0002380492	\$5,000.00	Total: \$15,000.00
177	rebern Seller ID 2507267004 Yang Li	VA0002380492	\$5,000.00	Total: \$15,000.00
178	shwa520109 Seller ID 2328972903 Xiangbin Zhang	VA0002380492	\$5,000.00	Total: \$15,000.00
180	wuying130 Seller ID 2080690123 Dandan Cheng	VA0002380492 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
181	yananlssqian Seller ID 2277659053 Zhenyu he	VA0002380492	\$5,000.00	Total: \$15,000.00
183	ainnee35 Seller ID 2277690756 Shanshan Yan	VA0002379893	\$5,000.00	Total: \$15,000.00
184	cryptall Seller ID 2398942506 CHAO PAN	VA0002379893	\$5,000.00	Total: \$15,000.00
188	givend Seller ID 2428813682 guangxue Nie	VA0002379893	\$5,000.00	Total: \$15,000.00
190	huanliu369 Seller ID 2080686445 Xiaolu Zhao	VA0002379893	\$5,000.00	Total: \$15,000.00
191	kafeng66 Seller ID 2306178826 Zhanfeng Zhao	VA0002379893	\$5,000.00	Total: \$15,000.00

145 Defaulted Defendants as Listed on Schedule A 1:24-cv-01547

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
193	lovesh159 Seller ID 2277689186 Shanshan Yan	VA0002379893	\$5,000.00	Total: \$15,000.00
194	lvllan1989 Seller ID 2080350393 Yanming Yuan	VA0002379893	\$5,000.00	Total: \$15,000.00
195	mingsun123 Seller ID 2080353222	VA0002379893	\$5,000.00	Total: \$15,000.00
196	Ochilight Seller ID 2475060076 Pinghua Liu	VA0002379893	\$5,000.00	Total: \$15,000.00
201	serret8888 Seller ID 2410052404 Xiu Zhang	VA0002379893	\$5,000.00	Total: \$15,000.00
204	sunny278311 Seller ID 2299397443 Peng Xiang Ren	VA0002379893	\$5,000.00	Total: \$15,000.00
206	Yoloday Seller ID 2386588947 Dandan Cheng	VA0002379893	\$5,000.00	Total: \$15,000.00
207	zhan8432 Seller ID 2348925569 Zhanfeng Zhou	VA0002379893	\$5,000.00	Total: \$15,000.00
208	zjz145 Seller ID 2244831015 Shanshan Yan	VA0002379893	\$5,000.00	Total: \$15,000.00
Total				\$2,355,000.00

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No.: 1:24-cv-01547-ARW

Honorable Andrea R. Wood

DECLARATION OF LIANGJIE LI
IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Default Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff markets and sells women's clothing and related items under the "Rotita" brand name ("Rotita").

5. Rotita is an extremely well-known source of women's clothing in the United States and has been the subject of rampant counterfeit sales through online platforms such as Amazon, Walmart, Alibaba, Temu, Aliexpress, and eBay (the "Platform"), which is the online sales platform at issue in this action. These are the six largest online retailers in the World – and Plaintiff does not sell its products through any one of them. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

6. Plaintiff seeks an award of statutory damages against all defaulted Schedule "A" Defendants (the "Defaulted Defendants") in this action. The Defaulted Defendants are accused of intentionally and willfully infringing Plaintiff's following four (4) federally registered copyrights asserted in this action: (1) VA0002379894; (2) VA0002379911; (3) VA0002380492; and (4) VA0002379893 (the "Copyright Protected Images").

7. It is without question that the Defaulted Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have almost instantaneously appeared on the Defaulted Defendants' online stores maintained with the Platform (the "Online Stores"). Moreover, the Defaulted Defendants have unquestionably been operating their Online Stores using the misappropriated Copyright Protected Images through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis.

8. The basic nature of the copyright infringement scheme employed demonstrates that the Defaulted Defendants not only knew of the impropriety of their conduct but had to implement their counterfeit scheme through sophisticated sources and established supply chains. This is the

only possible scenario under which the Defaulted Defendants could immediately procure, without authorization, Plaintiff's new copyright protected product images and offer them for sale through their Online Stores. In addition, the Defaulted Defendants have intentionally used the Copyright Protected Images for soliciting counterfeit, knockoff Rotita product sales on a Platform that Plaintiff does not, and has not, utilized to sell its authentic products. Simply put, these facts not only establish the Defaulted Defendants' knowledge and intentional infringement of Plaintiff's Copyright Protected Images.

9. Plaintiff has paid the rate of \$500 per hour for Shawn A. Mangano, Esq.'s legal services in this action and in other pending actions. Plaintiff has also paid the rates of \$400 per hour for Joseph W. Droter, Esq.'s legal services in this action and in other pending actions. Plaintiff has also paid the rate of \$275 per hour for paralegal services provided by Heather Ikerd and Elizabeth Cummings in this action and in other pending actions.

10. Plaintiff's rough estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff roughly estimates that over \$1,000,000 is derived from sales in the State of Illinois. Moreover, Plaintiff spends roughly anywhere from \$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works being asserted in, currently, over fourteen (14) enforcement actions initiated in this judicial district. Simply put, Plaintiff is an extremely successful company that earns millions of dollars from product sales in the United States – including within the State of Illinois. To do so, Plaintiff annually spends tens of millions of dollars advertising in the United States to promote the sale of its brand.

11. Plaintiff expects to earn a net profit of approximately 30% on the sale of its Rotita brand products. This figure, however, includes substantial advertising expenses that the Defaulted Defendants would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by misappropriating its copyright protected images and imbedding the term "Rotita" in their Temu.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on eBay.com despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that the Defaulted Defendants' Online Stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of the Defaulted Defendants' profits would fall within the net profit range. However, it is impossible to definitively calculate the Defaulted Defendants' total sales on the Platform through their Online Stores or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

12. The Defaulted Defendants named in the company's copyright infringement enforcement actions are engaged in the practice of copying Plaintiff's copyright protected product images almost instantaneously after they are first displayed on the company's website and then associating these images with sale and promotion of unauthorized, counterfeit products of substandard quality, thereby deceiving consumers – including the citizens of the State of Illinois. Moreover, given the nature of Plaintiff's goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by any of the named Defaulted Defendants. Simply put, Plaintiff maintains that the Defaulted Defendants are acting in concert, pursuant to a common scheme, whereby they independently copy the company's copyright protected images, without authorization, from its website or such unauthorized images are being provided by the same

common source associated with manufacturing the counterfeit products being sold on the Defaulted Defendants' Platform storefronts.

13. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulted Defendants' unauthorized use of its federally registered copyright protected images asserted in this action. This results in the direct harm to Plaintiff's brand reputation and loss of consumer goodwill, both of which are harms that are virtually impossible to ascertain the resulting economic loss.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Executed on December 27, 2024, in Hong Kong.

By: Liangjie Li
LIANGJIE LI

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of December 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, eBay.

By: /s/ Shawn A. Mangano
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